

DECLARATION OF NATALIE NEWELL

I, Natalie Newell, state and declare as follows:

1. I am over the age of 18, a resident of Maricopa County, State of Arizona, and am competent to testify and to make this Declaration. I have personal knowledge of the matters stated in this Declaration and if called to testify, would do so as stated herein.

2. I am an attorney on inactive status working as a paralegal and administrative assistant for the law firm of Gillespie, Shields & Taylor, co-counsel on the matter of *Kahraman v. State of Arizona, et al.*, 22-CV-00375-PHX-SRB, currently pending in the District of Arizona.

3. I work with Thomas A. Connelly, Mills + Woods Law PLLC, lead counsel, and DeeAn Gillespie Strub, co-counsel and owner of the Gillespie, Shield, & Taylor law firm, on the *Kahraman* matter.

4. I was primarily responsible for drafting Plaintiffs' Controverting Statement of Facts in Support of Response in Opposition to Defendant's Motion for Summary Judgment [Doc. 232] ("CSOF").

5. During the editing process, the document became corrupted and there were issues with the paragraph numbering. In the process of resolving the WORD issues, apparently, paragraph 81 was inadvertently deleted, and the subsequent paragraph numbers were automatically adjusted by WORD, such that what was originally paragraph 82 became paragraph 81, 83 became 82, and so on through 89 becoming 88.

6. I inadvertently did not recognize that paragraph 81 had been deleted, and the subsequent paragraph numbers automatically modified by WORD.

7. During the drafting of Plaintiffs' CSOF [Doc. 232], my aunt was rushed by ambulance to the hospital where she was admitted to the ICU and remained, mostly unconscious, for 6 days. During this time, and because of my aunt's hospitalization, my elderly grandparents (ages 88 and 93) required my help to navigate the hospital process,

doctors and specialists, and in caring for their own needs. My mother, who usually helps her parents during a crisis, was undergoing chemotherapy treatment for cancer and could not help. These events contributed to my not recognizing the inadvertent deletion of Paragraph 81 and the subsequent renumbering of Paragraphs 81-89.

I declare under penalty of perjury that the foregoing is true and correct. I further declare that my electronic signature preceded by /s/ as affixed here is intended as my legal signature.

/s/ *Natalie Newell*
Natalie Newell